

Civil Action No. 4:18-cv-1098

3. Obviously, Watts is an individual, not an agency of the United States government, and is not dependent upon Congress to appropriate funds for him to operate. This argument is frivolous on its face and not made in good faith. At a minimum, it is not a basis upon which to grant a stay. Watts sets forth no valid argument supporting his contention that this civil case should not go forward based on his “lack of funds.”

4. Furthermore, the Court has already considered and rejected his prior motion to stay the litigation [Doc. 14], and his co-Defendant’s motion to stay [Doc. 19]. *See* Orders Denying Stay, Docs. 16, 21.

5. For the forgoing reasons—and for the reasons set forth in the SEC’s previous opposition briefs analyzing these issues [Docs. 15 and 20]—the Court should deny Watts’s motion.

Dated: May 22, 2019

Respectfully submitted,

/s/ Jennifer D. Reece

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CERTIFICATE OF SERVICE

I affirm that on May 22, 2019, I electronically filed the foregoing document with the Clerk of the Court for the Southern District of Texas, Houston Division, and have served all parties by mail in accordance with Fed.R.Civ.P. 5.

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